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INTRODUCTION

The Office of Internal Audit performed a follow-up review between the period of January 1, 2004 and June 30, 2004 to determine if the Family Independence Agency had complied with the recommendations included in the Office of the Auditor General's (OAG) performance audit of the Children's Protective Services Program, for the period October 1, 1994 through December 31, 1996. The performance audit contained 5 material findings (Findings 1, 2, 3, 9, and 13) and 11 other reportable conditions. The Office of Child Protective Services and Foster Care is responsible for developing Children's Protective Services Program policies and procedures. FIA's local and district offices are to implement the provisions of the Child Protection Law and Program policies and procedures. The mission of the Program is to protect children who are at risk of Child Abuse and/or Child Neglect (CA/N). FIA has identified the Program as one of its core responsibilities.

SCOPE

We interviewed Children's Protective Services Program management and staff. Also, we reviewed pertinent policies, procedures, statutes, training information, and peer review results.

FOLLOW-UP REVIEW RESULTS

INVESTIGATION AND SUBSTANTIATION OF RECORDED CA/N CASES

FINDING

1. Intake Screening Process

RECOMMENDATION

We recommend that FIA revise the Program intake screening process and investigate complaints of suspected CA/N as required by the Law.

CORRECTIVE ACTION PLAN/UPDATE 07/2001

Since the implementation of policy and training in July 1998 and the operational review process in December 1999, there has been continued improvement in the proper handling of complaints at intake. The number of complaints properly denied/assigned for investigation has improved from 76.1 percent in December 1996, to 92 percent in February 2000, to 94 percent currently.

FOLLOW-UP REVIEW CONCLUSION

Item 711-6 of the Childrens Protective Services Manual defines the Agency's responsibility to receive and investigate complaints and also discusses when the Agency must turn the complaints over to another agency to investigate.

We reviewed the "CPS Peer Review Report" for 4 FIA county offices (peer reviews). The peer reviews are completed by the CPS Peer Review Team which is made up of Local Office Protective Services Supervisors. Their goal is to strengthen the Local Office's Children's Protective Services Program through a comprehensive review process and the sharing of identified best practices. Ratings of each specific item were measured against a standard of 90% compliance for

Policy and Procedures. The peer reviews were completed between April and December of 2003.

Criterion # 1 of the peer review states: "Intake complaints correctly screened out/assigned and complete." Our review of the peer review reports indicated that 309 (98%) of 316 complaints were properly screened out or assigned for investigation.

However, we were informed that the 7 complaints not properly screened out or assigned ($316-309=7$) were all rejected complaints that without further information should have been assigned for investigations. We were further informed that 60 of the complaints were screened out complaints. Therefore 12% (7 divided by 60) of the 60 complaints reviewed that were screened out by county offices were improperly rejected and not investigated.

Although FIA has revised its intake screening process, they are not in compliance regarding the need to investigate complaints of suspected CA/N.

NOTE: We were informed that as of July 1, 2004 the peer reviews will no longer be performed. The CPS Peer Review personnel will be transferred to Children and Family Services Review, which covers a small portion of CPS and will not be as in-depth as the peer reviews were.

FINDING

2. Investigations of Suspected CA/N

RECOMMENDATIONS

We recommend that FIA commence investigations on a timely basis, conduct thorough investigations of suspected CA/N, and substantiate cases with considerable evidence that CA/N had occurred.

We also recommend that FIA revise its Services Manual to provide caseworkers with authoritative guidance for investigating suspected CA/N involving violence between teens and their parents.

WE AGAIN RECOMMEND THAT CASEWORKERS COMPLETE INVESTIGATIONS OF SUSPECTED CA/N ON A TIMELY BASIS AS REQUIRED BY FIA PROCEDURE.

CORRECTIVE ACTION PLAN/UPDATE 07/2001

First Recommendation: The operational review process monitors CPS performance and promotes improvement in this area. From May 1999 through July 2001 the thoroughness of investigations, and appropriateness of their disposition has improved to 84 percent and 76 percent, respectively.

Second Recommendation: The OAG stated in their Follow-Up Report of January 2001 that FIA complied with the second recommendation.

Third Recommendation: Completing investigations on a timely basis has improved from 50 percent in December 1996 to 66 percent currently. Policy will be implemented in October 2001 that will extend the time frame in which an

investigation can be completed from 21 days to 30 days. This along with the exception process which allows for the extension of the investigation time frame in certain situations; continued monitoring through the operational review process; and follow-up by the Zone office, it is anticipated that significant improvement in compliance will continue.

FOLLOW-UP REVIEW CONCLUSION

The OAG's first recommendation recommends that FIA conduct thorough investigations of suspected CA/N. The peer reviews for the 4 county offices included in our review disclosed less than 90% compliance with 13 of the 18 criteria regarding investigations.

The OAG's first recommendation also recommends that FIA commence investigations on a timely basis. Criterion # 10 of the peer review states: "The Investigation commencement and face-to-face contacts met or exceeded the appropriate priority response time frames, or if unable to locate, appropriate steps were taken and documented." The peer reviews for the 4 county offices included in our review determined 197 (77%) of 256 cases met this criterion. This is less than the standard of 90% compliance for Policy and Procedures.

The OAG's first recommendation further recommends that FIA substantiate cases with considerable evidence that CA/N had occurred. Criterion #20 of the peer review states: "The "Findings" section of the investigation summary contains all relevant evidence." The peer reviews for the 4 county offices included in our review determined 208 (81%) of 256 cases met this criterion. This is less than the standard of 90% compliance for Policy and Procedures.

Pertaining to the second recommendation the OAG's Follow-Up report of January 2001 stated that "FIA revised its policies and procedures pertaining to the investigative process, including guidance related to violence between teens and their parents." They further state that FIA complied with the second recommendation.

Our review determined this recommendation was addressed first by Services Manual Bulletin 97-34, issued December 12, 1997 and later addressed by Childrens Protective Services Manual Item CFP 713-8, dated May 1, 2003.

We concur that FIA complied with the second recommendation.

The OAG's third recommendation recommends that caseworkers complete investigations of suspected CA/N on a timely basis. Criterion #7 of the peer review states: "The Investigation Summary was completed and presented for typing within 30 days of receipt of complaint; if not, an extension of the 30 day deadline was signed and filed in the case record." The peer reviews for the 4 county offices included in our review determined 180 (70%) of 256 cases met this criterion. This is less than the standard of 90% compliance for Policy and Procedures.

Based on the peer review results, FIA did not comply with the first and third recommendations.

FINDING

3. CA/N Complaint Investigation Risk Analysis

RECOMMENDATION

We recommend that FIA establish a method to uniformly measure and assess the risk of CA/N when investigating CA/N complaints.

CORRECTIVE ACTION PLAN/OAG FOLLOW-UP REVIEW 01/02/2001

FIA revised its policies and procedures for the intake and investigation process related to assessing the safety of children. Also, FIA established an operational review process to assess compliance with program policies and procedures related to assessing the safety of children.

FOLLOW-UP REVIEW CONCLUSION

FIA had policies and procedures in place for the intake and investigation process related to assessing the safety of children. Also FIA's CPS Peer Review Report assesses compliance with Program policies and procedures related to assessing the safety of children.

The OAG's Follow-Up Review concluded that FIA complied with the recommendation. We concur that FIA complied with the recommendation.

FINDING

4. Timeliness of Initial Face-to-Face Contact

RECOMMENDATION

We recommend that caseworkers document requests for supervisory approval to waive time requirements for initial face-to-face contacts prior to the expiration of the time requirements.

CORRECTIVE ACTION PLAN/UPDATE 09/2002

A request was submitted for system development and the system review undertaken in FY 2002, with testing to begin in FY 2003. Due to the retirement of the system operator, development may be delayed until fiscal year 2004.

FOLLOW-UP REVIEW CONCLUSION

Childrens Protective Services Manual Items CFP 712-4, p.1-2, and CFP 713-3, p.1 state the time frames in which face-to-face contact must take place. CFP 713-3, p.2 states, "In every case, CPS must make a face-to- face contact no later than 72 hours from the time of the complaint."

The Interim Child & Family Services Bulletin 2004-002 (CFB 2004-002) states that, "The FIA-140 instructions have been revised to state that an exception must be approved prior to expiration of Standard of Promptness (SOP) deadlines."

The FIA-140 form (CPS Exception Documentation) states that the form must be completed at the time the worker realizes the 24/72 hour face-to-face SOP cannot be met as well as approved by supervision prior to the expiration of the SOP.

Criterion #10 of the peer review states: "The Investigation commencement and face-to-face contacts met or exceeded the appropriate priority response time frames, or if unable to locate, appropriate steps were taken and documented." The peer reviews for the 4 county offices included in our review determined 197 (77%) of 256 cases met this criterion. This is less than the standard of 90% compliance for Policy and Procedures. Therefore, while the FIA-140 form addresses this finding, FIA is not in compliance with this recommendation.

NOTE: We were informed by the CPS Program Manager that the Child Abuse and Neglect System (CANS) which will address this finding is scheduled for implementation in March 2005.

FINDING

5. Written Reports From Mandated Reporters

RECOMMENDATION

We recommend that FIA establish an effective process for obtaining written reports of suspected CA/N from mandated reporters.

CORRECTIVE ACTION PLAN/UPDATE 07/2001

The operational review process has found that the FIA 3200, or written documentation is in the case file 87 percent of the time. After reviewing all possibilities, it was determined that an automation enhancement would be burdensome to local staff and create more paper. A reminder has been incorporated in SWSS, and policy mandates that workers follow-up with mandated reporters within 72 hours if they have not received the FIA 3200.

FOLLOW-UP REVIEW CONCLUSION

Item CFP 712-1, p.2 states that if the mandated reporter has not completed the FIA-3200 (Report of Actual or Suspected Child Abuse or Neglect) the worker is to remind the person of the legal requirement to do so within 72 hours and send it to the Agency. Also a reminder has been incorporated in SWSS which asks if the FIA-3200 has been requested which the worker must answer yes or no.

Criterion #4 of the peer review states: "FIA 3200, or written documentation is in the case file, or requested from mandated reporter." The peer reviews determined

186 (89%) of 209 cases met this criteria. This is 1% less than the standard of 90% compliance for Policy and Procedures. This is an improvement from the sample in the OAG's audit, which disclosed that mandated reporters had filed written reports or intake documents indicated that caseworkers had verbally informed these reporters of their written report requirement for 74% of complaints from mandated reporters. However, FIA should make efforts to further improve in this area.

FINDING

6. Notification of Disposition of Complaints Made by Mandated Reporters

RECOMMENDATION

We recommend that FIA revise Program policy to provide mandated reporters with information regarding the disposition of their CA/N complaints.

CORRECTIVE ACTION PLAN/UPDATE 07/2001

Complied

FOLLOW-UP REVIEW CONCLUSION

CFP 712-9, p.1-2 specifies that mandated reporters be notified in writing about the disposition of their CA/N complaint. However, Criterion #59 of the peer review states: "Written notice of screen-outs and dispositions/legal actions were provided to mandated reporting sources within required time frames." The peer reviews for the 4 county offices included in our review determined 82 (74%) of 111 cases met this criterion. This is less than the standard of 90% compliance for Policy and Procedures.

Therefore FIA complied with the recommendation to revise Program policy to provide mandated reporters with information regarding the disposition of their

CA/N complaints, but they are not meeting the 90% standard of compliance for the policy.

FINDING

7. Families in Need of Services

RECOMMENDATION

We recommend that FIA evaluate the benefits of establishing a third category of investigation disposition for families determined to be in need of services to help reduce the risk of CA/N in the future and seek amendatory legislation if appropriate.

CORRECTIVE ACTION PLAN/UPDATE 07/2001

A Five-Category Disposition System was implemented July 1999.

FOLLOW-UP REVIEW CONCLUSION

Public Act 484 of 1998, effective July 1, 1999 defined five categories for CPS investigation dispositions. This Five Category Disposition System identifies families in need of services and the Agency then provides necessary services or assists the families in obtaining the necessary services.

FINDING

8. Recording and Referral of Suspected Sexual Abuse or Sexual Exploitation to Law Enforcement Officials

RECOMMENDATIONS

We recommend that FIA establish a system to identify all complaints relating to suspected sexual abuse or sexual exploitation.

We also recommend that the Program refer all suspected sexual abuse or sexual exploitation cases to law enforcement officials as required by the Law.

CORRECTIVE ACTION PLAN/UPDATE 09/2002

The system continues to be developed; completion has been extended to FY 2004.

FOLLOW-UP REVIEW CONCLUSION

Regarding the first recommendation, we were informed by the CPS Program Manager that the Child Abuse and Neglect System (CANS) which will identify all complaints relating to suspected sexual abuse or sexual exploitation is scheduled for implementation in March 2005.

CFP 712-3, p.1 indicates that any complaints that include allegations that the child is the victim of sexual abuse or sexual exploitation must be referred to law enforcement within 24 hours.

Criterion #9 of the peer review states: "Requested assistance of and cooperated with Law Enforcement as required." The peer reviews for the 4 county offices included in our review determined 23 (82%) of 28 cases met this criterion. This is less than the standard of 90% compliance for Policy and Procedures.

Therefore, while the language in the CFP Manual now complies with the intent of the second recommendation, FIA is not in compliance with the recommendation.

SUBSTANTIATED CA/N CASES

FINDING

9. Actions Taken on Substantiated Cases

RECOMMENDATION

We recommend that caseworkers take sufficient, appropriate, or timely action to reduce the risk of additional abuse and neglect for substantiated CA/N cases.

CORRECTIVE ACTION PLAN/UPDATE 07/2001

Policy has been clarified and enhanced, between 1998 and 2001, for handling and disposing of CPS investigations that are designed to reduce additional CAN in substantiated cases. Policies Include; implementing structured decision making; policy on LEIN checks; policy on “home visits”; policy on interviewing children and making visual assessments; policy for when a child is home alone; policy for when a child denies abuse; policy on investigations involving teenagers; policy on sibling on sibling violence; policy outlining response criteria; policy on the 5-Category Disposition system; and incorporating the Investigation Protocol into the manual.

FOLLOW-UP REVIEW CONCLUSION

We noted the many Policy clarifications and enhancements designed to reduce additional CA/N in substantiated cases referred to in FIA’s Corrective Action Plan of July 2001. Also FIA now has in place a comprehensive training program for all caseworkers called the Child Welfare Institute (CWI). CWI includes training to reduce the risk of additional abuse and neglect for substantiated CA/N cases.

In reviewing the peer reviews we noted that there were sections of the review covering “Preponderance of Evidence Cases” and “Petitions/Category I” cases. These sections pertain to actions taken on substantiated cases. For the 4 County Offices we reviewed there were 8 criteria reviewed in the peer reviews for the “Preponderance of Evidence Cases” and 12 criteria reviewed for the “Petitions/Category I” cases, or 20 criteria in total. The peer reviews disclosed that the standard of 90% compliance for Policy and Procedures was not met for 16 of the 20 criteria.

FIA has revised its policies and procedures but based on peer review results, FIA is not yet in compliance with the recommendation.

FINDING

10. Notification of Perpetrators on the Central Registry

RECOMMENDATIONS

We recommend that FIA notify all perpetrators of their placement on the Registry, document such notifications, and issue notifications on a timely basis.

We also recommend that FIA improve its internal control system to provide for notification to perpetrators on the Historical Registry.

CORRECTIVE ACTION PLAN/UPDATE 07/2001

Policy and systems are in place to notify perpetrators in a timely manner. Those on the historical registry are notified when subsequent complaints are received or when applying for licenses or adoption. The operational review process is monitoring compliance, which is currently at 75 percent.

FOLLOW-UP REVIEW CONCLUSION

Regarding the first recommendation, Criterion #56 of the peer review states: “Perpetrator notifications were mailed timely and receipts or other documentation were in the cases.” The peer reviews for the 4 county offices included in our review determined 24 (55%) of 44 cases met this criterion. This is less than the standard of 90% compliance for Policy and Procedures.

Regarding the second recommendation, CFP 713-13, “Perpetrator Notification” gives an overview of the system now in place to notify perpetrators in a Category II or I CPS case of their rights when they are listed on the Central Registry.

Criterion #57 of the peer review states: “Prior history existed on Central Registry and the requirements for perpetrator notification were completed.” The peer reviews for the 4 county offices included in our review determined 5 (56%) of 9 cases met this criterion. This is less than the standard of 90% compliance for Policy and Procedures.

Based on the peer review results, FIA did not comply with the recommendations for Finding #10.

FINDING

11. Registry Data Integrity

RECOMMENDATION

We recommend that FIA establish effective controls to help ensure that Registry data is accurate and complete.

CORRECTIVE ACTION PLAN/UPDATE 07/2001

The operational review process was implemented in December 1999. A case reading form is in place which allows for supervisor oversight on whether accurate and complete data was entered on the Central Registry.

FOLLOW-UP REVIEW CONCLUSION

Criterion #60 of the peer review states: "FIA 2070's were correctly completed and in case files." (The FIA-2070 [or CPS2070] is a transaction screen used in the Protective Services Management Information System. The local office records the results of each investigation on the CPS2070. The CPS2070 transaction adds perpetrators and victims to the Central Registry on new cases and updates Central Registry information on open cases). The peer reviews for the 4 county offices included in our review determined 152 (73%) of 208 cases met this criterion. This is less than the standard of 90% compliance for Policy and Procedures.

Based on the peer review results, FIA did not comply with the recommendation for Finding #11.

FINDING

12. Controls Over Access to the Registry

RECOMMENDATION

We recommend that FIA establish internal controls to effectively monitor access to the Registry.

CORRECTIVE ACTION PLAN/UPDATE 07/2001

Internal controls were established through the implementation of time limited access codes in September 1999, and ongoing monitoring by the FIA zone offices.

FOLLOW-UP REVIEW CONCLUSION

We were informed that the Registry can only be accessed through CIMS. All CIMS users must have a password to access CIMS, which they are to keep secret. The CIMS Security Policy states that the system will not allow access if the password has not been changed at least every 30 days. We were further informed that the only CIMS status that has access to the Central Registry is CRS (Services Clerks).

Local offices receive a monthly report that identifies the current CIMS status for all employees of the office. Local offices are instructed to review the report to ensure that the status is appropriate for each employee. However, the Office of Internal Audit frequently finds in its audits that offices have not performed the monthly review. The lack of review weakens this control to the extent that it may not prevent inappropriate access to the Registry. Therefore FIA has not yet fully complied with the recommendation for Finding #12.

OTHER PERTINENT ISSUES

FINDING

13. Continuous Quality Improvement Process

RECOMMENDATION

We recommend that FIA establish a comprehensive continuous quality improvement process to monitor and improve the Program's effectiveness in protecting children.

CORRECTIVE ACTION PLAN/UPDATE 07/2001

The operational review process was implemented in December 1999.

FOLLOW-UP REVIEW CONCLUSION

The peer reviews include a “Continuous Quality Improvement Practices” section. Within this section there were areas which pertained to Supervisors (Staff Development, Program Knowledge/Training, Management Practices); Workers (Case Management Practices, Program Knowledge, Communicating and Interviewing Skills); and Management Leadership (Management Practices).

The peer reviews also include sections on Policy and Procedures; Supportive Work Environment; and a Customer Satisfaction section, which used Client Satisfaction Surveys and Children’s Satisfaction Surveys to arrive at its findings.

The OAG’s Follow-Up Review concluded that FIA substantially complied with the recommendation. They stated that FIA established several components of a continuous quality improvement process, but that additional time and efforts would be needed to fully implement a continuous quality improvement process that provides for an evaluation of overall Program effectiveness in protecting children. (Examples of this that were mentioned in the OAG audit report were performance indicators which showed a reduction in Chronic CA/N cases, the incidence of violence between teens and their parents, and infant deaths caused by CA/N).

The peer review does not include performance indicators that evaluate the overall Program effectiveness in protecting children such as those in OAG’s example. In addition, the CPS Program Manager informed us that these additional evaluations are not being done. Therefore, we concur that FIA substantially complied with the recommendation.

FINDING

14. Implementation of Training for Caseworkers

RECOMMENDATION

We recommend that FIA continue its efforts to implement a comprehensive training program for all caseworkers.

CORRECTIVE ACTION PLAN/UPDATE 07/2001

Comprehensive training, administered by the Child Welfare Institute is currently in place. Components on Domestic Violence, Solution Focused, Worker Safety and Forensic Interviewing have been added. Training is continually under review and enhanced to ensure that it is meeting the needs of workers.

FOLLOW-UP REVIEW CONCLUSION

FIA now has in place a comprehensive training program for all caseworkers called the Child Welfare Institute (CWI).

The “Continuous Quality Improvement Practices” portion of the peer reviews includes a section on Staff Development. One of the criterion in that section state: “Supervisors provide and/or support new worker training through CWI, and also support/provide at least 8 hours of training annually for experienced staff.” The peer reviews for the 4 county offices included in our review had a range of from 71% to 100% compliance with this criterion, with an average compliance rate of 89%. (Ratings for each specific criterion were measured against a standard of 80% for “Continuous Quality Improvement Practices.”)

Another of the criterion in the Staff Development section states: “Supervisors train/prepare workers for Court.” The peer reviews for the 4 county offices

included in our review determined that all 4 county offices achieved a compliance rate of 100% for this criterion.

We conclude that FIA has complied with the recommendation.

FINDING

15. Contracting and Competitive Bidding for Purchased Services

RECOMMENDATION

We recommend that county office staff comply with FIA procedures regarding contracting and competitive bidding for purchased psychological and medical services.

CORRECTIVE ACTION PLAN/UPDATE 07/2001

A fair market rate fee of \$200 for medical assessments and \$300 for second opinions have been established to allow local offices the flexibility to use experienced medical providers in their geographic area. A statewide contract for second opinions and medical consultations has been developed for those local offices that need it.

Psychological assessments/evaluations have a rate of \$300 established with a process to exceed that amount with prior approval. Funds are accessed through the Medical Services Authorization process, allowing local offices the flexibility to access appropriate and available assessments and evaluations.

FOLLOW-UP REVIEW CONCLUSION

We reviewed current FIA procedures for purchasing psychological and medical services. FIA now employs a fair market value rate setting process for various

psychological and medical services. SRM (Service Requirements Manual) 234 includes a “Diagnostic Examination Fee Schedule” which includes a fee maximum of \$200 for General Medical Examination and Evaluations, and for Child Sexual Abuse Examinations; and \$300 for Second Opinions and Psychological Evaluations; as well as additional fee maximums for other medical services.

There is also a procedure available to obtain an exception when psychological and medical service charges exceed the Diagnostic Examination Fee Schedule in which the services supervisor approves the services. Also each month the county office receives the EN-050 (Medical Services Authorization Exception Report for CPS) report which management is to use to monitor county office medical service authorizations that exceed the Diagnostic Examination Fee Schedule.

We were informed that there is no contract that covers these services or expenditures. Section 100 of the Contract Policy Manual states: “Execution of a contract is required for FIA purchase of any vendor services for \$2,500 or more within a twelve (12) month period...” Also, when purchases are expected to exceed \$50,000, formal, competitive bidding is required. Since purchases to many of the providers of the above-mentioned services exceed \$2,500 within a twelve-month period, we conclude that FIA has not complied with the recommendation.

FINDING

16. Confidentiality of Program Information

RECOMMENDATION

We recommend that FIA establish controls to help prevent the unauthorized release of confidential Program case information.

CORRECTIVE ACTION PLAN/UPDATE 07/2001

Release of any information regarding CPS records is governed by the Child Protection Law. The CPL was revised in April 1998 and 1999 to clarify and strengthen the law on releasing confidential information. Policy was also revised to reflect these changes.

FOLLOW-UP REVIEW CONCLUSION

The OAG report stated that, "FIA had not established written policies and procedures regarding the use of cellular phones involving confidential Program information." Currently the Administrative Handbook section AHT 202 has established written policies and procedures regarding the use of cellular phones involving confidential Program information. In addition, an "Administrations, Bureaus and Offices" (ABO) memo dated September 15, 2003 states that the cellular phones are to be used for safety reasons. It also states that, "Cellular phones are to be used for work-related, mission-critical, effectiveness reasons when there is no alternative way of communicating with another party."

Also Childrens Protective Services Manual Item 712-9 states that, "... by law, written notification to mandated reporters must not include personally identifying information for a person named in the report" when advising them of the disposition of the cases they referred.

The OAG report also had concerns about the confidentiality of information in regard to FIA accounting records for purchased services including the names of children involved in CA/N.

Currently the CIS File Maintenance Manual's description of the payment process for medical services authorizations indicates that the screen which shows the medical services payment to be added is left blank in the field for the recipient's name, and the instructions indicate that this is not a field into which entries can be made. Also a review of MAIN reports EX-015 (Detail Expenditures By Appropriations for Program Code), EX-010 (Detail Expenditures By Appropriation), and "Accounting Event Record Inquiry" had no field available for the name of the child receiving the medical services. Therefore we conclude the FIA has addressed the concerns raised by OAG for this finding.